



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**MAY 08 2003**

Christine Grams, Treasurer  
Rod Grams for U.S. Senate  
320 E Main Street  
P.O. Box 1029  
Anoka, MN 55303

RE: MUR 5364

Dear Ms. Grams:

On April 28, 2003, the Federal Election Commission found that there is reason to believe Rod Grams for U.S. Senate and you, as treasurer, violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Dawn R. Jackson, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Ellen L. Weintraub  
Chair

**Enclosures**

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

cc: Rod Grams

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**RESPONDENTS:** Rod Grams for U.S. Senate, and  
Christine Grams, as Treasurer<sup>1</sup>

**I. INTRODUCTION**

The Commission audited Rod Grams for U.S. Senate and Christine Grams, as Treasurer, (the "Committee") pursuant to 2 U.S.C. § 438(b). *See* Attachment 1.

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the factual and legal analysis contained in the audit referral, a copy of which is attached, the Commission found reason to believe that Rod Grams for U.S. Senate and its Treasurer, Christine Grams, violated of 2 U.S.C. § 441a(f) for receiving \$160,353 excessive contributions from individuals and unregistered political committees.

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<sup>1</sup> Tim Schmidt was Treasurer of Rod Grams for U.S. Senate from November 30, 1993 - July 26, 2001. Christine Grams is the current Treasurer.